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8 **Attorney for Defendant**
9 **KRISTY WATTS**

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,)	Case No.: CR 09-0849VRW
)	
13 Plaintiff,)	STIPULATION OF COUNSEL AND Proposed
)	ORDER TO CHANGE SURRENDER DATE
14 vs.)	
)	
15 KRISTY WATTS,)	
)	
16 Defendant.)	
)	
17)	

18
19 It is hereby stipulated and requested by the parties, Anthony Brass for Defendant Kristy
20 Watts and Doug Sprague for the United States of America, that the surrender date for defendant
21 be moved from June 25, 2010 to July 9, 2010.

22 This court previously sign an order extending the surrender date for Ms. Watts' due to her
23 diagnosis of breast cancer. Since that time, Ms. Watts' doctor has provided a letter with regard
24 to her treatment plan, which is attached hereto.

25
26 Because of the aggressive type of cancer Ms. Watts is suffering from, AUSA Doug
27 Sprague is in contact with the Bureau of Prisons (BOP) regarding available options. Based on
28 the outcome of the conversations Mr. Sprague has with the BOP, Ms. Watts, through counsel,

1 may ask the court for a stay of execution of her incarceration until the conclusion of treatment, in
2 approximately 6 months time.

3 Allen Lew of pretrial services has been notified and he has no objection to moving Ms.
4 Watts' surrender date.
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8 Dated: June 16, 2010

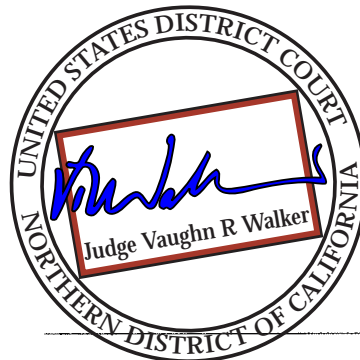
/s/ _____
DOUG SPRAGUE
Assistant United States

9
10
11 Dated: June 16, 2010

/s/ _____
ANTHONY BRASS
Attorney for Kristy Watts

12
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14
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17 IT IS SO ORDERED:

18
19
20 Dated: June 23, 2010



~~VAUGHN A. WALKER~~

21
22 United States District Court Judge
23 VAUGHN R WALKER
24
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26
27
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June 14, 2010

Mr. Anthony J. Brass
Attorney at Law
3223 Webster Street @Lombard
San Francisco, CA 94123

Dear Tony,

Re: Ms. Kristine Watts, d.o.b. 03-27-1962

Ms. Watts has what appears to be a rapidly growing left breast cancer, as it was mammographically undetectable in November, 2009, but a mere six months later, easily discernible. In view of its large size, neoadjuvant chemotherapy consisting of dose-dense Adriamycin and Cytosan followed by Taxol is the treatment of choice. She will subsequently have surgery and then need radiation therapy.

This treatment regimen is quite demanding, as chemotherapy is given every two weeks and toxicities may be significant. If counts and toxicity allow, chemotherapy is given every two weeks for 8 sessions, completed in approximately 16 weeks or 4 months. A 4 to 6-week recovery will then ensue, and then surgery will be undertaken. Another 3 to 4 weeks recovery will be given followed by 6 weeks of radiation.

This chemotherapy is quite demanding, and because of the toxicity of chemotherapy, life-threatening low blood counts and infection can occur. Because of this, she would certainly best be served by having her treatment while not incarcerated.

I would be happy to talk to the judge, if you think that would help.

If you have any questions, do not hesitate to call. Best wishes.

Sincerely,

Peter D. Eisenberg, M.D.

Oncology-Hematology